

February 21, 2005

Food and Drug Administration Office of Nutritional Products, Labeling and Dietary Supplements (HFS-810) Center for Food Safety and Applied Nutrition

5100 Paint Branch Pkwy College Park, MD 20740

DaVinci Laboratories



Dear Sir/Madam:

Notice is herby given pursuant to the requirements of Section 403®(6) (21 U.S.C. 343 ® (6) of the Feder Food, Drug, and Cosmetic Act and in accordance with the requirements of 21 CFR 101.93, that FoodScience Corporation and 20 New England Drive, Essex Junciton, VT 05453 within the past 30 days commenced marketing a dietary supplement bearing the following statement(s) on the label and/or in the labeling:

TEXT OF CLAIM(S):

"A Dietary Supplement to Support Adrenal Function"

NAME OF INGREDIENT(S) THAT IS SUBJECT OF CLAIM

Thiamin

Riboflavin

Niacinamide

B6 (as P-5-P)

Folic Acid

B12 (methylcobalamin)

Biotin

Vitamin C

Licorice (deglyzhirized)

Pantethine

Ashwaganda 2.5% extract

Eleuthero sinensis (0.8%) dried root

Phosphatidylserine

Panax ginseng

NAME OF SUPPLEMENT (INCLUDING BRAND NAME)

Davinci Laboratories of Vermont: AdrenaLyze™ Foodscience of Vermont: Adrenal Balance Mountain Naturals of Vermont: Adrenal Balance

The undersigned certifies that the information contained in this notice is complete and accurate and that FoodScience Corporation has substantiation that the statements are truthful and not misleading.

Sincerely,

Quality Control Coordinator

975 0162 LET 15772

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